

# EXHIBIT A

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

BROKERARTE CAPITAL PARTNERS,  
LLC,

Plaintiff,

vs.

Case No. 2:23-cv-10066  
Hon. George Caram Steeh

THE DETROIT INSTITUTE OF ARTS,

Defendant.

/

**DECLARATION OF DR. JILL SHAW IN SUPPORT OF DEFENDANT'S  
OPPOSITION TO PLAINTIFF'S MOTION FOR TEMPORARY  
RESTRAINING ORDER AND POSSESSION PENDING FINAL  
JUDGMENT**

I, Dr. Jill Shaw, declare under penalty of perjury as follows.

1. I am over eighteen years of age and competent to testify to the facts and observations set forth in this Declaration. The information set forth below is based on my personal knowledge, and if called to testify in this matter, I would and could testify truthfully to the facts set forth below.

2. I am employed by The Detroit Institute of Arts ("DIA"), based in Detroit, Michigan, as the Head of the James Pearson Duffy Department of Modern and Contemporary Art and the Rebecca A. Boylan and Thomas W. Sidlik Curator of European Art, 1850-1970.

3. I have been an employee of the DIA since January 2016.

4. The DIA currently is showing *Van Gogh in America*, an exhibition

celebrating the DIA's status as the first United States public museum to purchase a Van Gogh painting, his *Self-Portrait* (1887).

5. The exhibition marks the 100th anniversary of the DIA's acquisition of *Self-Portrait* and includes seventy-three other Van Gogh works that the DIA assembled from around the world.

6. The exhibition was conceived in 2016 and required approximately six years to prepare. In total the exhibition includes a combined eighty works of art from over fifty lenders and the DIA's own collection.

7. These loans include Vincent Van Gogh's *The Novel Reader*, which is on loan to the DIA from a foreign lender.

8. The DIA applied to the State Department for immunity for twenty-seven works of art under the Immunity from Seizure Act on May 12, 2022.

9. The DIA's application for immunity included Vincent Van Gogh's *The Novel Reader*.

10. Prior to applying for immunity, the DIA confirmed with the Art Loss Register that *The Novel Reader* had not been reported as lost or stolen.

11. Like its peer U.S. art museums, the DIA relies on loans from collectors, galleries, and museums around the world to provide the visiting public with meaningful cultural and educational experiences.

Pursuant to 28 U.S.C. § 1746, I hereby declare and state under penalty of

perjury that the foregoing is true and correct to the best of my knowledge, information, and belief.

Dated: January 16, 2023



Dr. Jill Shaw